

ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS PAUL M. LION  
(OCA/USPS-T4-1-7)  
(June 27, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

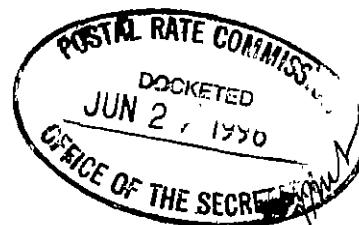
Respectfully submitted,



GAIL WILLETTE  
Director  
Office of the Consumer Advocate



DAVID RUDERMAN  
Attorney



OCA/USPS-T4-1. Please refer to pages 34 and 35 of your testimony concerning attributable costs.

a. Are there any differences between the attributable costs of providing post office box service to

(1) resident versus non-resident box holders? If yes, please specify these cost differences.

(2) non-resident US citizens versus non-resident foreign national box holders? If yes, please specify these cost differences.

b. Please identify in the three main categories of post office box attributable costs, "Space Support," Space Provision," and "All Other," the differences in attributable costs associated with providing box service to residents, non-residents, non-resident US citizens, and non-resident foreign nationals.

To the extent possible, the information requested in this interrogatory should be provided separately by fee Group and box size. Also, if Postal Service data are unavailable to support these cost differences, please provided the best estimates of the cost differences, and provide documentary or other support for the estimates.

OCA/USPS-T4-2. Please refer to page 35, lines 7-14, of your testimony concerning the attribution of costs to post office boxes. To the best of your knowledge, does the methodology of attributing Space Support, Space Provision, and All Other costs conform to the Commission's methodology of attributing these costs in Docket Nos. R90-1 and R94-1. If you cannot confirm, please explain all known differences from the Commission's methodology and the effect of those differences on attributable costs.

OCA/USPS-T4-3. Please refer to page 35, lines 7-14, of your testimony concerning the attribution of costs to post office boxes. To the best of your knowledge, does the methodology of allocating attributable costs to post office boxes by fee Group and box size conform to the Commission's methodology of allocating attributable costs to post office boxes in Docket Nos. R90-1 and R94-1. If you cannot confirm, please explain all known differences from the Commission's methodology and the effect of those differences on the allocation of attributable costs to post office boxes.

OCA/USPS-T4-4. Please refer to page 19, lines 1-6, of your testimony.

- a. Please confirm that the first stage of sampling in your Subgroup I-C sample was to select a stratified sample of ZIP Codes from a universe of approximately 12,000 ZIP Codes. If you do not confirm, please describe exactly what was sampled at this first step.
- b. Please confirm that the term "representative sample" refers to a probability sample of the ZIP Codes containing CMRAs. If you do not confirm, please explain.
- c. If the sample of ZIP Codes is differential by strata, please provide the stratum sampling rates for each of the strata.

OCA/USPS-T4-5. Please refer to the six steps described on pages 19-20 of your testimony.

- a. Please provide the number of ZIP Codes remaining eligible for sampling at the conclusion of step 1.
- b. Please provide the number of ZIP Codes remaining eligible for sampling at the conclusion of step 2.
- c. Please provide a list of the 32 metropolitan areas that are referred to in step 3.

- d. Please provide the number of unique ZIP Codes that were represented by the 291 CMRAs identified at the conclusion of step 4.
- e. Please confirm that ZIP Codes that did not match ZIP Codes of the 291 CMRAs identified in step 4 were eliminated from the sampling universe. If you do not confirm, please explain.
- f. Please confirm that the list of CMRAs was expanded to 327 by augmenting the sample only in ZIP Codes already identified in the CMRA list of step 4. If you do not confirm, then please explain how you determined which additional ZIP Codes to the new CMRAs would be selected from.
- g. Please confirm that the 327 CMRAs referred to in step 6 consisted of all CMRAs that could be located in either the Yellow Pages or the PhoneDisc file for the 32 metropolitan areas identified in step 3. If you do not confirm, please explain.
- h. Please describe the PhoneDisc file referred to in step 6.
- i. Please confirm that the Yellow Pages phone books were all the 1995 editions of the phone books. If you do not confirm, please provide the name of each metropolitan area and the corresponding phone book date. If a metropolitan area has several Yellow Pages phone books, separately list

each one. (For example, the Washington DC metro area includes Northern Virginia, Montgomery Co. (MD), Prince Georges Co. (MD), and the District of Columbia.)

- j. Please provide the date associated with the entries on the PhoneDisc file.
- k. Please confirm that the portions of the PhoneDisc file used correspond with the same geography as that covered by the Yellow Pages phone books relied upon.

OCA/USPS-T4-6. Please refer to page 22 of your testimony. You state that only 50 of the 299 CMRAs provided data on mailbox size. You then go on to display the average box sizes in Table 12.

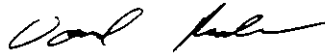
- a. Are these figures meant to be representative of CMRA box sizes in general? If not, then what is the purpose of Table 12?
- b. Do you view these 50 CMRAs as a representative sample of the total 299 CMRAs interviewed? Please explain.
- c. Please confirm that you only attempted to determine box size characteristics for the 299 CMRAs of Delivery Subgroup I-C. If you do confirm, please explain why Delivery Subgroups I-A and I-B were excluded. If you do not confirm, please reconcile with lines 1-4 of page 22 of your testimony.

d. Are these average box sizes weighted by the number of boxes of each size at each responding CMRA? If not, explain why not and what these numbers represent. If so, please cite the portion of the supporting spreadsheet file (BOXSIZE.XLS) that computes the weighted averages.

OCA/USPS-T4-7. Is it more accurate to describe the Subgroup I-C sample as a probability sample of ZIP Codes or as a census of CMRAs in the 32 identified metropolitan areas? Please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.



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June 27, 1996